

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO, WESTERN DIVISION**

**JACQUELYN MARES, M.D.,**

**Plaintiff,**

**v.**

**MIAMI VALLEY HOSPITAL, et al.**

**Defendants.**

)  
) Civil Action No. 3:20-cv-00453  
)  
) Judge Michael J. Newman  
) Magistrate Judge Peter B. Silvain, Jr.  
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**MOTION FOR INFORMAL DISCOVERY CONFERENCE**

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Now come the Defendants, by and through counsel, and hereby move this Court pursuant to Local Rule 37.1 for an informal discovery conference with the Court. The grounds for this Motion are detailed in the attached Memorandum.

Respectfully submitted,

*/s/ Karen T. Dunlevey*

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Boonshoft School of Medicine, Jerome Yaklic, M.D., G.  
Theodore Talbot, M.D. and Albert F. Painter, Psy.D

### **MEMORANDUM**

A status conference was held with the Court on July 17, 2022. During the conference, the parties requested the Court's assistance relative to a few unresolved discovery disputes. The Court requested a motion asking it to schedule a brief informal discovery conference. Counsel for all parties indicated that they are available the afternoon of Thursday, July 21, 2022, which appeared to also be available to the Court at that time. The discovery cut-off in this matter is July 22, 2022 and if these discovery issues are not resolved prior to that time, a continuance of that deadline may be needed. The Defendants do not anticipate that these discovery issues will impact the dispositive motion deadline. Attached as Exhibit A is an email chain between all counsel, which identifies the discovery issues to be addressed and the parties' respective positions concerning same.

The Defendants respectfully request that the Court set this matter for a brief telephonic informal discovery conference.

Respectfully submitted,

/s/ Karen T. Dunlevey

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### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion was electronically filed and served upon all counsel of record through the Court's Case Management and Electronic Case Filing (CM/ECF) system on July 19, 2022.

/s/ Karen T. Dunlevey

Karen T. Dunlevey